



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
William A. Hinton State Laboratory Institute
305 South Street, Jamaica Plain, MA 02130

DEVAL L. PATRICK
GOVERNOR

TIMOTHY P. MURRAY
LIEUTENANT GOVERNOR

JUDYANN BIGBY, MD
SECRETARY

JOHN AUERBACH
COMMISSIONER

Carolyn Hely, ADA

Norfolk County District Attorney's Office
By e-mail

December 18, 2011

Re: Comm. v. [REDACTED]

ADA Hely,

Please find below a discovery package for the case noted above. The material is collated in the following manner:

- 1) the c.v.'s of the chemists
- 2) the Evidence Office receipt to the Stoughton Police
- 3) the inventory control card
- 4) the Drug Powder Analysis Form
- 5) the gas chromatography/mass spectrometry (gc/ms) data

I was the custodial chemist responsible for the chain of custody, weights and the preliminary analysis of the exhibit. Annie Khan ran the gc/ms for the confirmatory analysis.

If you need further clarification of this material, call me directly at (617) 983-6627.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lawler".

Michael Lawler
Senior Chemist

Cc: Annie Khan

Curriculum Vitae

Michael Lawler

Education:

University of Virginia, Charlottesville, Va. Bachelor of Arts in English, 1975

Harvard University, Cambridge, Ma. Master of Arts in biology, 1995

Experience:

1990-present currently Chemist III, Mass. Dept. of Public Health, Drug Lab analyst determining the identity of unknown substances and providing expert testimony in the Courts. Conduct special testing for poisons within drug exhibits (e.g. strychnine in MDMA)

2005-2008 lecturer in chemistry, Curry College, Milton, Ma.

1988-1990 New England Newborn Screening (NENS) Biochemist conducting pilot studies and validation trials of new newborn screening tests. Investigator and co-author of papers noted below. Introduced screening test for Biotinidase Deficiency. Liaison with interstate collaborators in national studies.

1983-1988 Supervised NENS urine screening lab for metabolic disorders. Conducted research in collaboration with Children's Hospital (Boston) detecting neuroblastoma, a cancer of early childhood. Conducted reference testing for rare metabolic disorders for an international audience.

1982-1983 NENS hypothyroid assay technologist with Tuft's University

1979-1981 Mass. Bay Community College, staff technologist preparing materials for the laboratory technician program, which included reagents, apparatus and maintaining stock cultures of human pathogens.

Additional education and special training

Drug Analysis, completed six week training course by senior staff within the

Department of Public Health Drug Analysis Laboratory

National Laboratory Network Training Program course as Expert Witness

Qualified as an expert witness in the Massachusetts Courts and the U.S. District Court

Current Drug Trends – Multijurisdictional Drug Task Force Academy August 2009

CDC course in public health response to bioterrorism

U.S. Army course in biologic warfare and terrorism

DEA Special Testing Lab Seminar June 2011

Sigma-Aldrich LC/MS – New Applications Fall 2011

Journal Publications

Screening, 1992, 1:34-37; Lawler,M., Frederick,S., Rodriguez-Anza, S., Wolf,B., Levy,H., *Newborn Screening for Biotinidase Deficiency, Pilot Study and Follow-up of Identified Cases*

Genetic Screening, 1990, 11-18, Mitchell,M., Lawler,M., Walraven,C., Hermos,R., *To Screen or Not to Screen for Congenital Hyperplasia: Is that the Question?*

The Journal of Pediatrics, 116: 78-83, Secor-McVoy,J., Lawler,M., Schmidt, M., Ebers,D., Hart,P., Pettit,D., Blitzer,M., Wolf,B., *Partial Biotinidase Deficiency: Clinical and Biochemical Features*

Professional Affiliations

Northeastern Association of Forensic Scientists (NEAFS) since 2005

Awards

Theobald Smith Education Grant for graduate studies

Curriculum Vitae

Annie Khan (Dookhan)

Education:

University of Massachusetts, Boston, Ma, Master of Science in Chemistry.

University of Massachusetts, Boston, Ma, Bachelor of Science in Biochemistry.

Experience:

2003 – present

Chemist I, II, Massachusetts Department of Public Health, Drug Analysis Laboratory

- *Completed six-week training course conducted by senior staff within the Department of Public Health, Drug Analysis Laboratory.
- *Appointed Assistant Analyst by Assistant Commissioner of Public Health, 2004.
- *Responsible for the identification of illicit drugs to determine violations of harmful and narcotic drug laws.
- *Trained in the use of complex analytical instrumentation, microscopes and balances for the purpose of drug analysis.
- *Maintenance and repairs of all analytical instruments.
- *Responsible for the Quality Control of all analytical instruments, reagents and controls/standards.
- *Responsible for the Quality Control/Quality Assurance program for the drug lab.
- *Notary Public.
- *Qualified as an expert witness in Massachusetts Courts and U.S. District Court

2001 – 2003

QC Analyst I, II, UMMS-Massachusetts Biologic Laboratory, QC Material Control

- *Completed proficiency training conducted by a member of the staff within the MLB Quality Control and Quality Assurance Department.
- *Method Development for creating new techniques and enhancing vaccines for the QC Dept. and FDA.
- *Writing, revising and reviewing Standard Operating Procedures (SOPs).
- *Trained and supervised new chemists and interns for the department.
- *Routine QC testing of products for the FDA.
- *Trained in the use of complex analytical instrumentation, and balances for the purpose of QC analysis for product and validation projects.
- *Calibration, preventive maintenance, QC and QA of analytical instrumentation.
- *Complete testing of chemicals for Vendor Validation Project for the FDA.
- *Compendial testing and interpretation of the USP, ACS, FCC, AOAC, Merck Index, PDR, etc.

Additional Training:

Dept. of Justice – Forensics Professionals. (numerous trainings)
GLP/GMP course with Massachusetts Biologic Laboratory.
QC/QA training according to FDA Codes and Regulations.
GC and GC/MS courses with Agilent Technologies and Restek.
HPLC course with Waters Cooperation.
FTIR course with Spectros.
TOC training with MBL and Sievers.

Association:

American Chemical Society (ACS)

Northeastern Association of Forensics Science (NEAFS)

PLEASE PRINT CLEARLY OR TYPE ALL INFORMATION

The Commonwealth of Massachusetts

Executive Office of Health and Human Services

Department of Public Health

State Laboratory Institute

Boston Drug Laboratory

Tel (617) 983-6622

Fax (617) 983-6625

Boston Hours

8:00 – 11:00

2:00 – 4:00

Amherst Drug Laboratory

Tel (413) 545-2601

Fax (413) 545-2608

Amherst Hours

9:00 – 12:00

1:00 – 3:00

DRUG RECEIPT

City or Department: Stoughton PD Police Reference No.: [REDACTED]

Name and Rank of Submitting Officer: Det. James O'Connor

Defendant(s) Name (last, first, initial):

[REDACTED]

To be completed by Submitter
Description of Items Submitted

To be completed by Lab Personnel
Gross Weight Lab Number

11 PB's w/ white rock substance

8.85 g

[REDACTED]

Received by: AS Date: 2-8-11

No. [REDACTED]
City: Stoughton Police Dept.
Officer: Detective JAMES O'CONNOR
Def: [REDACTED]

Date Analyzed: 03-31-11

Amount:

Subst: SUB

No. Cont: 11 Cont: pb

Date Rec'd: 02/08/2011

Gross Wt.: 8.85

No. Analyzed: 2

Net Weight: 4.33g

Tests: 18/m

Prelim: cocaine

Findings: cocaine

(3-26-11)
8.20g
pb

(K)

blao

DRUG POWDER ANALYSIS FORM

3/31/11

SAMPLE #

AGENCY

Stoughton

ANALYST

MMR

No. of samples tested: 2

Evidence Wt.

8.83

PHYSICAL DESCRIPTION:

11pb w/sub (1pb open with 1000 sub)

Gross Wt (): _____

Gross Wt (): _____

Pkg. Wt: _____

Net Wt: 4.3384

Test #1 0.3206g

Test #2 0.4682g

OHAUS 2334 3-26-11
20g = 20.0000g
10g = 10.0001g
5g = 5.0001g
1g = 1.0000g

PRELIMINARY TESTS

Spot Tests

Cobalt Thiocyanate

(+) x2

Marquis

(-)

Froehde's

(-)

Mecke's

(-)

0.3206g
0.4682g
0.7188g

0.7188g
2.0 =
0.3914g

0.3914g
11.0 =
0.5384g

0.0

Microcrystalline Tests

Gold Chloride

(+) x2

TLTA

(+) x2

OTHER TESTS

PRELIMINARY TEST RESULTS

RESULTS

DATE

GC/MS CONFIRMATORY TEST

RESULTS

cocaine

MS OPERATOR

ASD

DATE

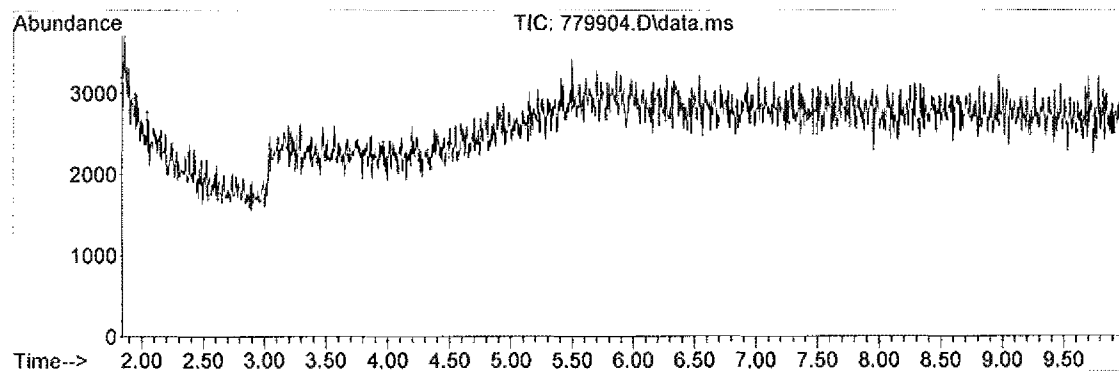
3/31/11

Area Percent / Library Search Report

Information from Data File:

File Name : C:\msdchem\1\data\SYSTEM6\2011\03_30_11\779904.D
Operator : ASD
Date Acquired : 30 Mar 2011 14:03
Sample Name : BLANK
Submitted by :
Vial Number : 1
AcquisitionMeth: DRUGS.M
Integrator : RTE

✓ ASD
01-11-2012



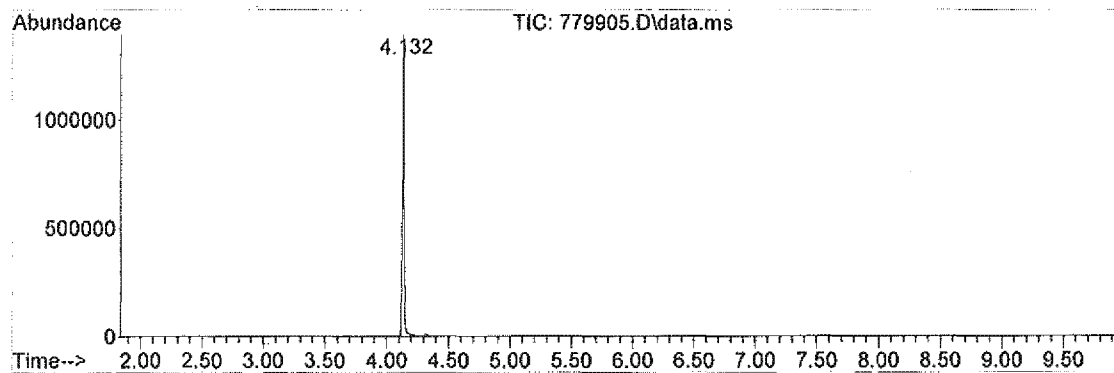
Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

Information from Data File:

File Name : C:\msdchem\1\data\SYSTEM6\2011\03_30_11\779905.D
 Operator : ASD
 Date Acquired : 30 Mar 2011 14:16
 Sample Name : COCAINE STD
 Submitted by :
 Vial Number : 5
 AcquisitionMeth: DRUGS.M
 Integrator : RTE



Ret. Time	Area	Area %	Ratio %
4.132	1417335	100.00	100.00

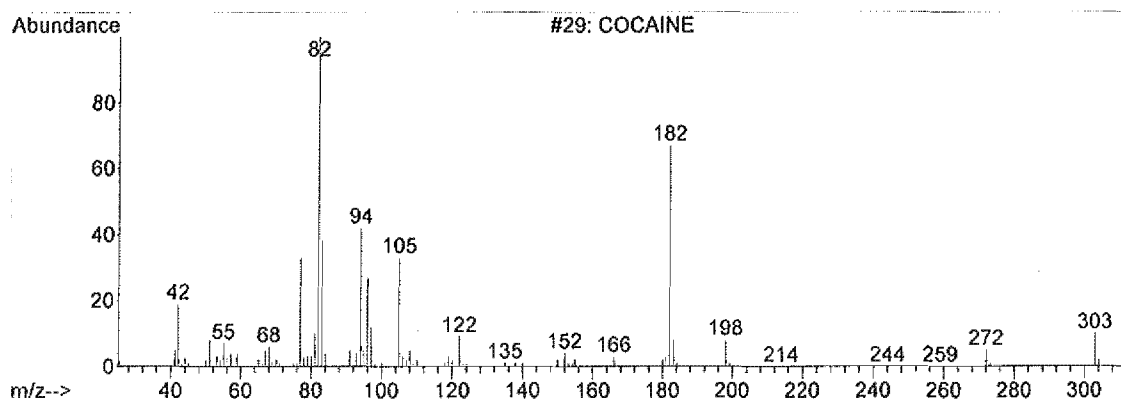
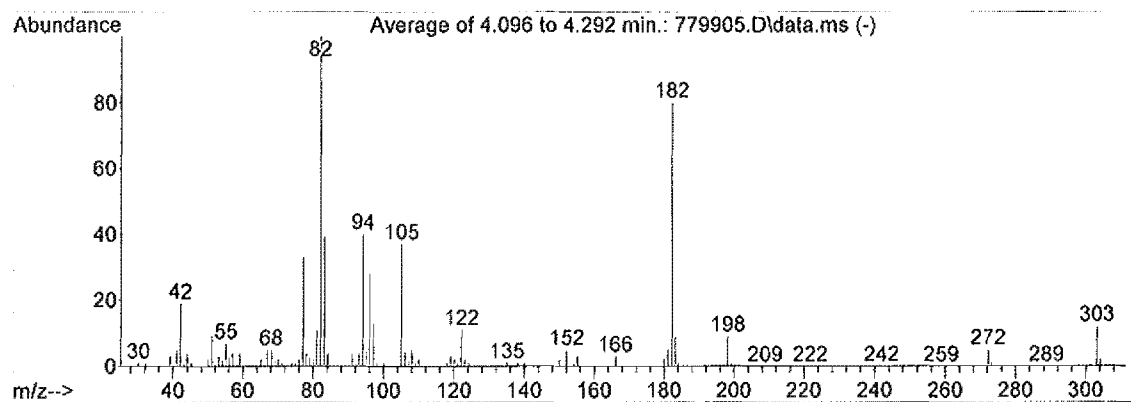
Area Percent / Library Search Report

Information from Data File:

File Name : C:\msdchem\1\data\SYSTEM6\2011\03_30_11\779905.D
 Operator : ASD
 Date Acquired : 30 Mar 2011 14:16
 Sample Name : COCAINE STD
 Submitted by :
 Vial Number : 5
 AcquisitionMeth: DRUGS.M
 Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
 C:\Database\NIST08.L Minimum Quality: 80
 C:\Database\PMW_TOX2.L

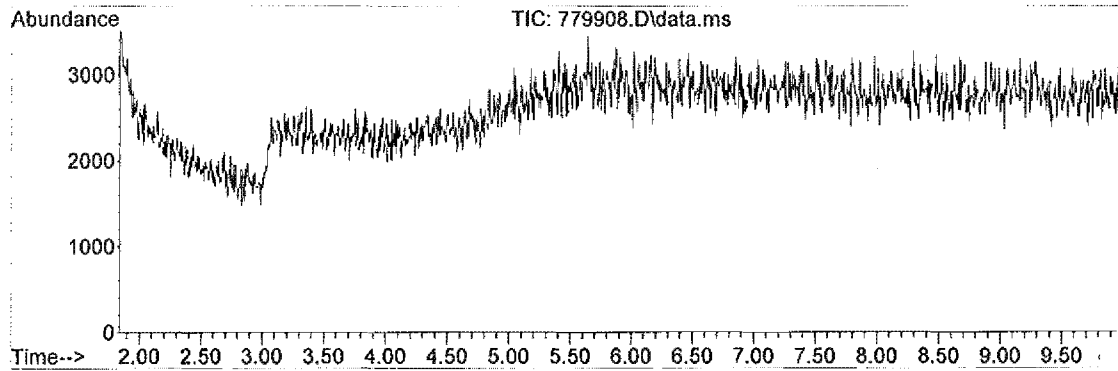
PK#	RT	Library/ID	CAS#	Qual
1	4.13	C:\Database\SLI.L COCAINE	000050-36-2	99



Area Percent / Library Search Report

Information from Data File:

File Name : C:\msdchem\1\data\SYSTEM6\2011\03_30_11\779908.D
Operator : ASD
Date Acquired : 30 Mar 2011 14:55
Sample Name : BLANK
Submitted by : MGL
Vial Number : 1
AcquisitionMeth: DRUGS.M
Integrator : RTE



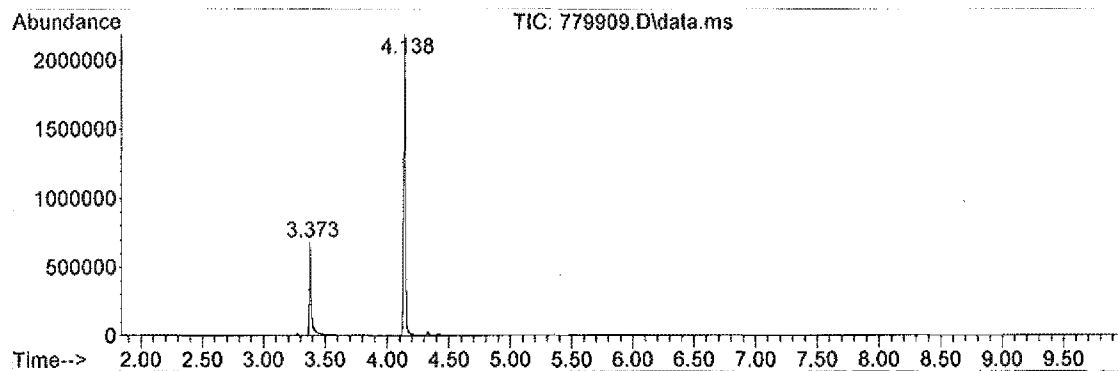
Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

Information from Data File:

File Name : C:\msdchem\1\data\SYSTEM6\2011\03_30_11\779909.D
 Operator : ASD
 Date Acquired : 30 Mar 2011 15:08
 Sample Name : XXXXXXXXXX
 Submitted by : MGL
 Vial Number : 9
 AcquisitionMeth: DRUGS.M
 Integrator : RTE



Ret. Time	Area	Area %	Ratio %
3.373	812149	25.03	33.39
4.138	2432024	74.97	100.00

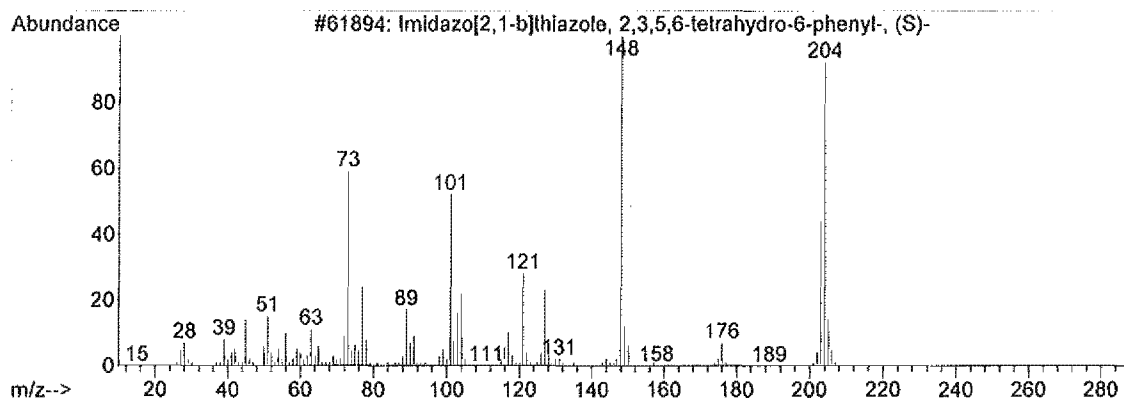
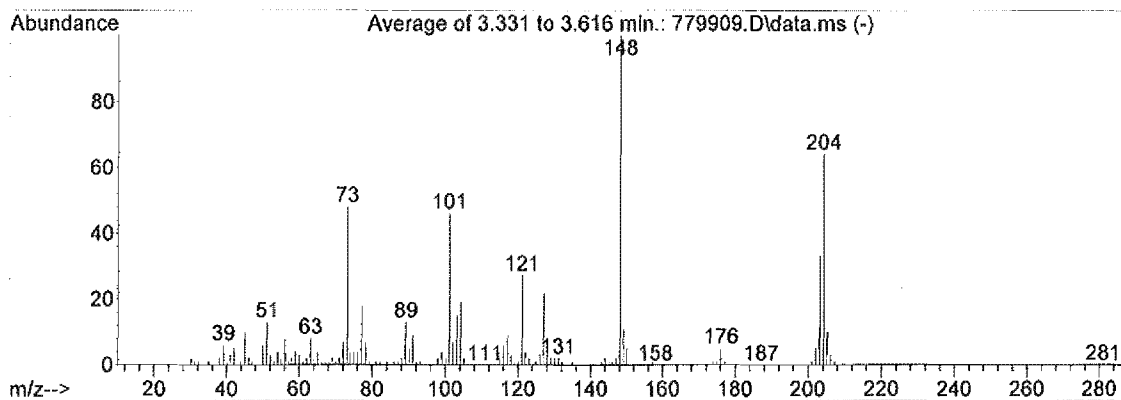
Area Percent / Library Search Report

Information from Data File:

File Name : C:\msdchem\1\data\SYSTEM6\2011\03_30_11\779909.D
 Operator : ASD
 Date Acquired : 30 Mar 2011 15:08
 Sample Name : XXXXXXXXXX
 Submitted by : MGL
 Vial Number : 9
 AcquisitionMeth: DRUGS.M
 Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
 C:\Database\NIST08.L Minimum Quality: 80
 C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	3.37	C:\Database\NIST08.L		
		Imidazo[2,1-b]thiazole, 2,3,5,6-tet	014769-73-4	99
		Levamisole	006649-23-6	99
		Levamisole	006649-23-6	98



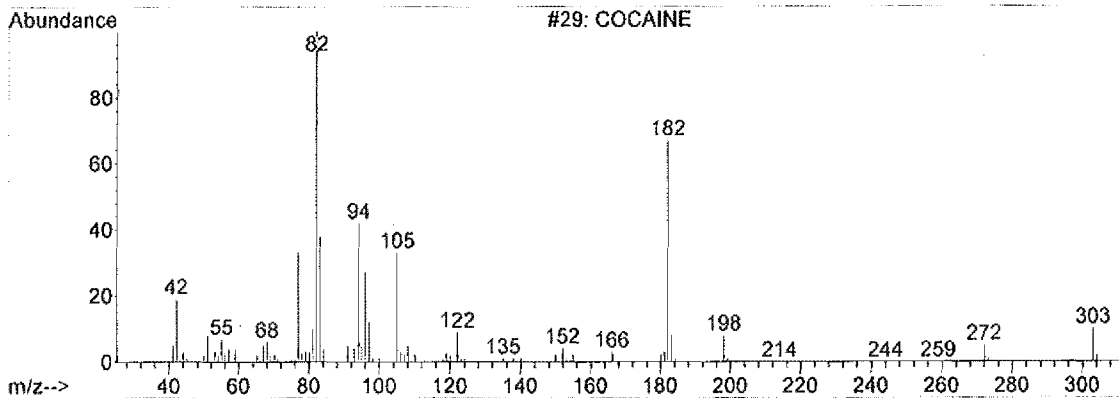
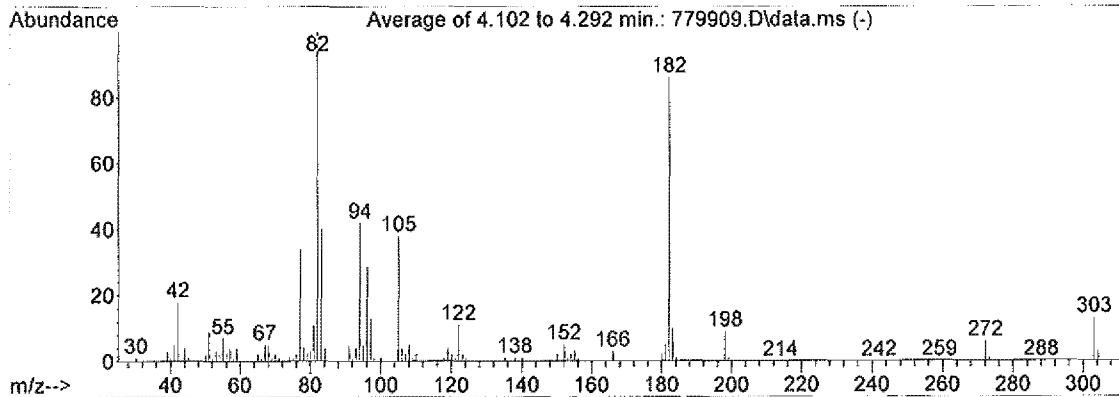
Area Percent / Library Search Report

Information from Data File:

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 Operator : ASD
 Date Acquired : 30 Mar 2011 15:08
 Sample Name : XXXXXXXXXX
 Submitted by : MGL
 Vial Number : 9
 AcquisitionMeth: DRUGS.M
 Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
 C:\Database\NIST08.L Minimum Quality: 80
 C:\Database\PMW_TOX2.L

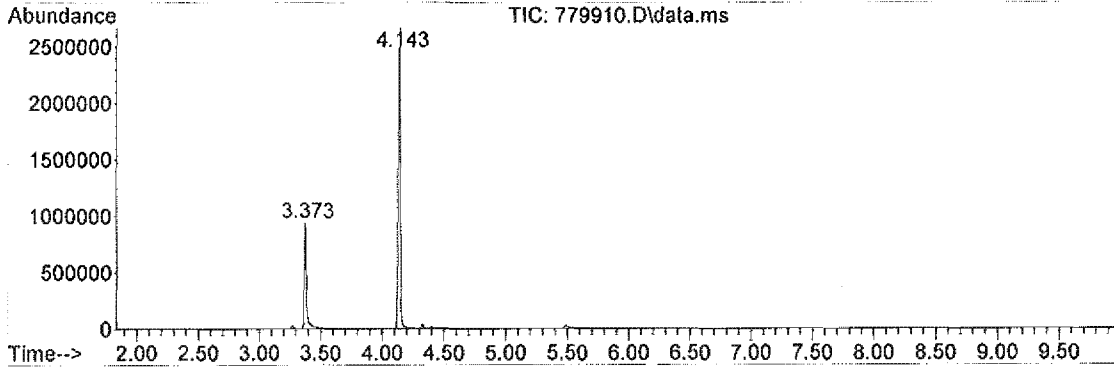
PK#	RT	Library/ID	CAS#	Qual
2	4.14	C:\Database\SLI.L COCAINE	000050-36-2	99



Area Percent / Library Search Report

Information from Data File:

File Name : C:\msdchem\1\data\SYSTEM6\2011\03_30_11\779910.D
 Operator : ASD
 Date Acquired : 30 Mar 2011 15:22
 Sample Name : XXXXXXXXXX
 Submitted by : MGL
 Vial Number : 10
 AcquisitionMeth: DRUGS.M
 Integrator : RTE



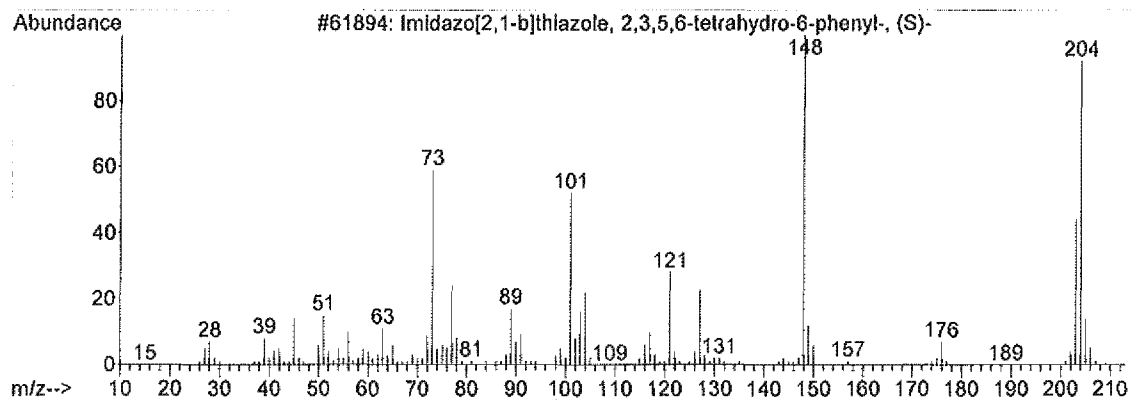
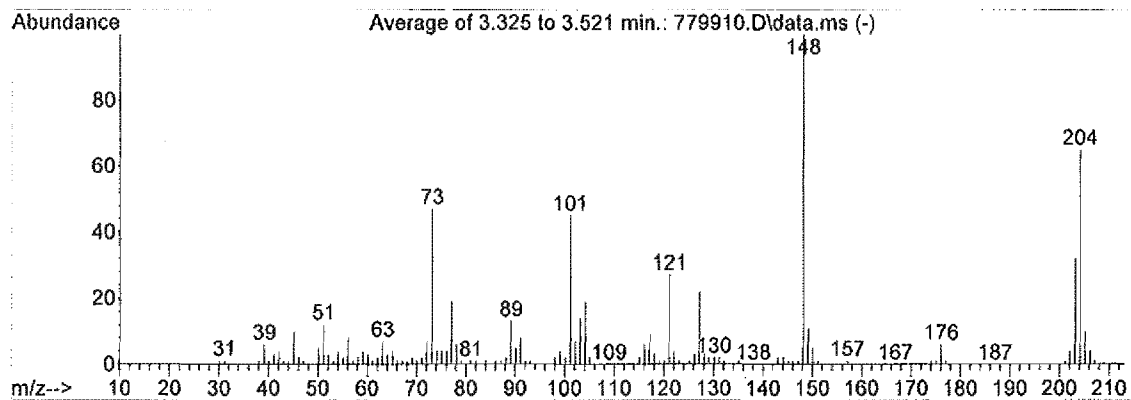
Ret. Time	Area	Area %	Ratio %
3.373	1163830	26.59	36.22
4.143	3213175	73.41	100.00

Information from Data File:

File Name : C:\msdchem\1\data\SYSTEM6\2011\03_30_11\779910.D
Operator : ASD
Date Acquired : 30 Mar 2011 15:22
Sample Name : XXXXXXXXXX
Submitted by : MGL
Vial Number : 10
AcquisitionMeth: DRUGS.M
Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
C:\Database\NIST08.L Minimum Quality: 80
C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	3.37	C:\Database\NIST08.L		
		Imidazo[2,1-b]thiazole, 2,3,5,6-tet	014769-73-4	99
		Levamisole	006649-23-6	99
		Levamisole	006649-23-6	98

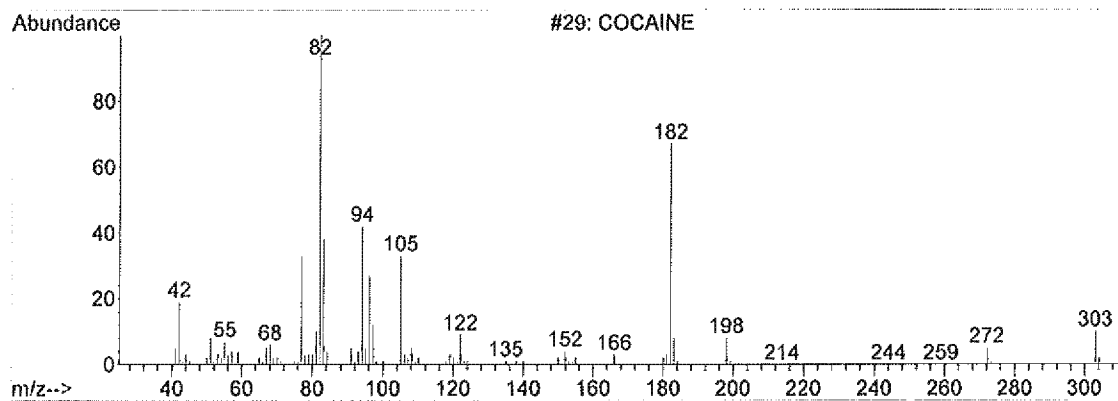
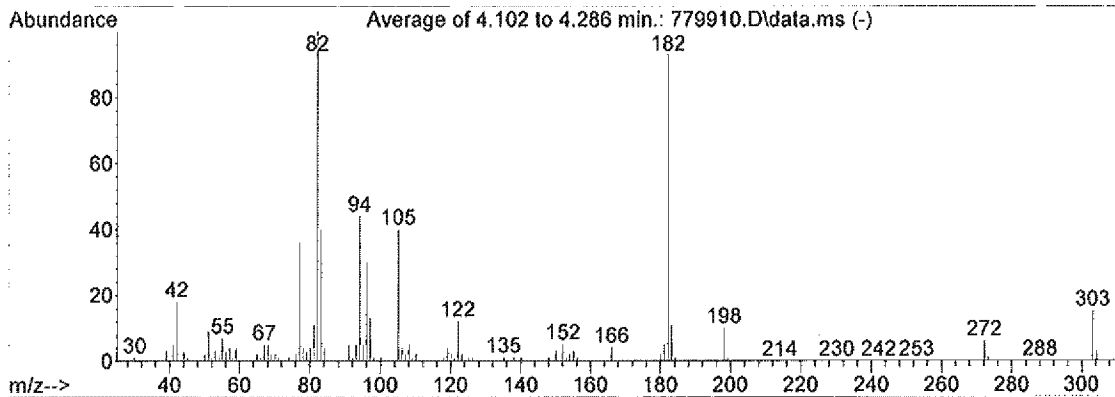


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Operator : ASD
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Sample Name : XXXXXXXXXX
Submitted by : MGL
Vial Number : 10
AcquisitionMeth: DRUGS.M
Integrator : RTE

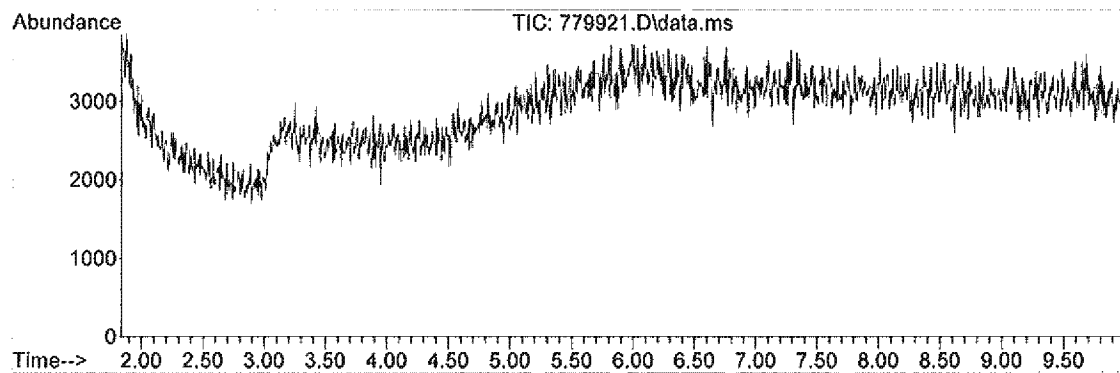
Search Libraries: C:\Database\SLI.L Minimum Quality: 80
C:\Database\NIST08.L Minimum Quality: 80
C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
2	4.14	C:\Database\SLI.L COCAINE	000050-36-2	99



Information from Data File:

File Name : C:\msdchem\1\data\SYSTEM6\2011\03_30_11\779921.D
Operator : ASD
Date Acquired : 30 Mar 2011 17:46
Sample Name : BLANK
Submitted by :
Vial Number : 1
AcquisitionMeth: DRUGS.M
Integrator : RTE

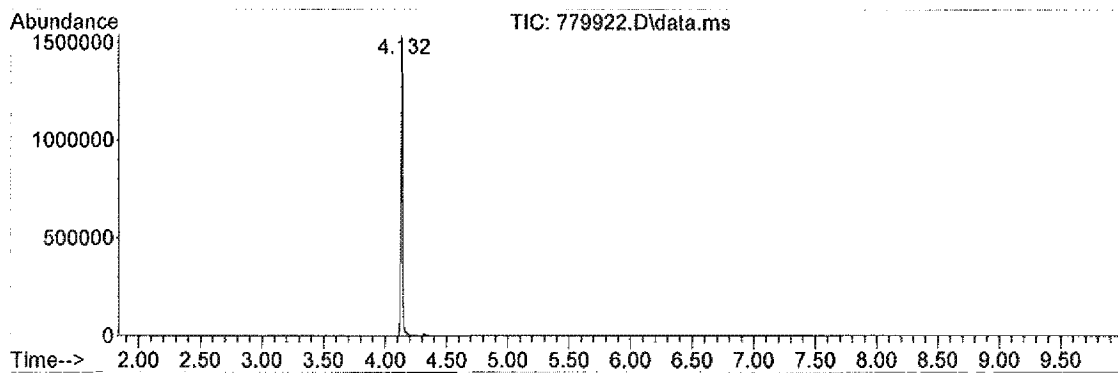


Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Information from Data File:

File Name : C:\msdchem\1\data\SYSTEM6\2011\03_30_11\779922.D
Operator : ASD
Date Acquired : 30 Mar 2011 17:59
Sample Name : COCAINE STD
Submitted by :
Vial Number : 5
AcquisitionMeth: DRUGS.M
Integrator : RTE



Ret. Time	Area	Area %	Ratio %
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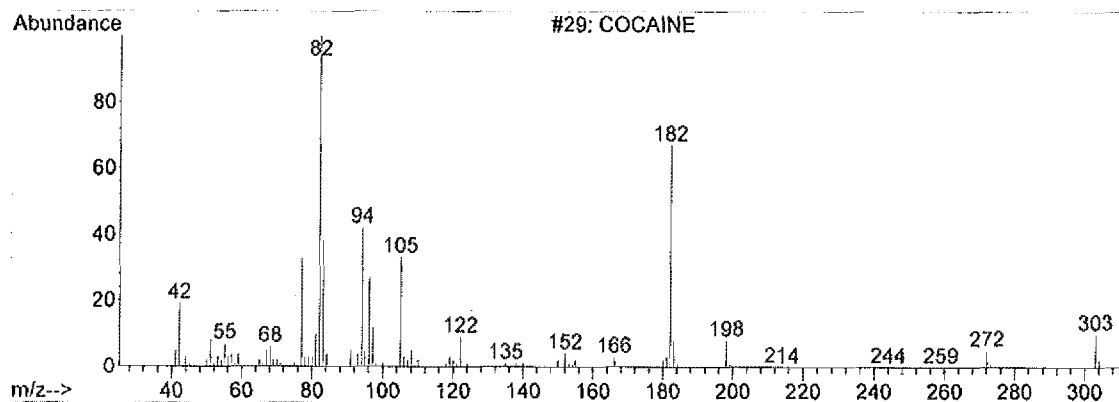
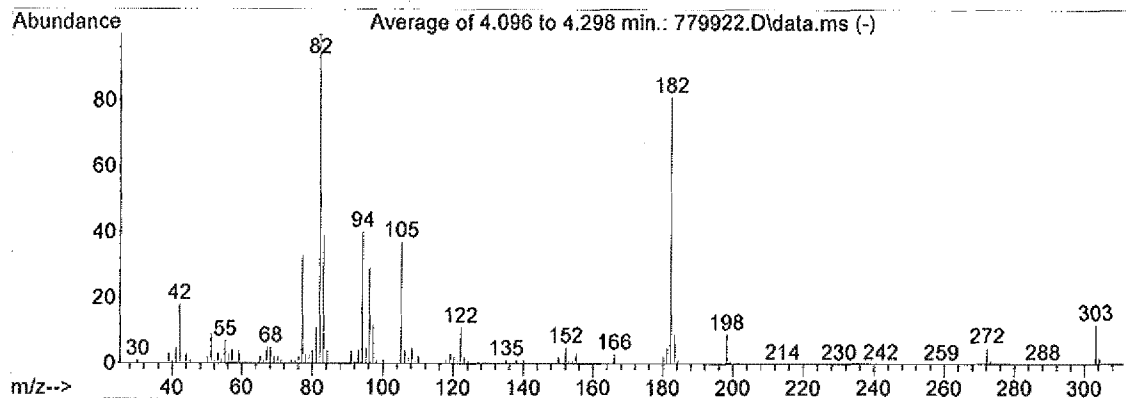
Area Percent / Library Search Report

Information from Data File:

File Name : C:\msdchem\1\data\SYSTEM6\2011\03_30_11\779922.D
 Operator : ASD
 Date Acquired : 30 Mar 2011 17:59
 Sample Name : COCAINE STD
 Submitted by :
 Vial Number : 5
 AcquisitionMeth: DRUGS.M
 Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
 C:\Database\NIST08.L Minimum Quality: 80
 C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	4.13	C:\Database\SLI.L COCAINE	000050-36-2	99



Last page.....no further data